

1 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

2 IN AND FOR THE COUNTY OF COCHISE

3 STATE OF ARIZONA,

4 Plaintiff,

5 vs.

6 DOUGLAS PACKER,

7 Defendant.

GRAND JURY NO. 19-00014

CASE NO. CR2019-00043

INDICTMENT

8  
9 The Grand Jurors of the County of Cochise, in the name of the State of Arizona,  
10 and by its authority accuse:

11 DOUGLAS PACKER

12 and charge that in Cochise County:

13 COUNT 1

14 On or about January 2, 2019, DOUGLAS PACKER committed sexual abuse by  
15 intentionally or knowingly engaging in sexual contact with a person fifteen or more years  
16 of age without consent, to wit: touched D.K.'s breast, in violation of A.R.S. §§13-1404,  
13-1401, 13-105, 13-701, 13-702, and 13-801, a class 5 felony.

17 COUNT 2

18 On or about January 2, 2019, DOUGLAS PACKER committed sexual abuse by  
19 intentionally or knowingly engaging in sexual contact with a person fifteen or more years  
20 of age without consent, to wit: touched D.K.'s genitals, in violation of A.R.S. §§13-1404,  
13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

21 COUNT 3

22 On or about January 2, 2019, DOUGLAS PACKER committed kidnapping by  
23 knowingly restraining another person with intent to inflict death, injury or sexual offense  
24 to victim, to wit: restrained D.K. to inflict sexual offenses on her, in violation of A.R.S.  
25 §§13-1304, 13-1301, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 2 felony.

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1 COUNT 4

2 On or about January 2, 2019, **DOUGLAS PACKER** committed unlawful sexual  
3 conduct by, as an employee of the Cochise County Jail, intentionally or knowingly  
4 engaged in any act of a sexual nature with an offender who was in the custody of the  
5 Cochise County Jail, to wit: D.K., in violation of A.R.S. §§13-1419, 13-1401, 13-105,  
6 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

7 COUNT 5

8 On or about January 4, 2019, **DOUGLAS PACKER** committed sexual abuse by  
9 intentionally or knowingly engaging in sexual contact with a person fifteen or more years  
10 of age without consent, to wit: touched D.K.'s breast, in violation of A.R.S. §§13-1404,  
11 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

12 COUNT 6

13 On or about January 4, 2019, **DOUGLAS PACKER** committed sexual abuse by  
14 intentionally or knowingly engaging in sexual contact with a person fifteen or more years  
15 of age without consent, to wit: touched D.K.'s genitals, in violation of A.R.S. §§13-1404,  
16 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

17 COUNT 7

18 On or about January 4, 2019, **DOUGLAS PACKER** committed sexual assault by  
19 intentionally or knowingly engaging in oral sexual contact, without consent, to wit: D.K.,  
20 in violation of A.R.S. §§13-1406, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801,  
21 a class 2 felony.

22 COUNT 8

23 On or about January 4, 2019, **DOUGLAS PACKER** committed unlawful sexual  
24 conduct by, as an employee of the Cochise County Jail, intentionally or knowingly  
25 engaged in any act of a sexual nature with an offender who was in the custody of the  
Cochise County Jail, to wit: D.K., in violation of A.R.S. §§13-1419, 13-1401, 13-105,  
13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 9

On or about January 4, 2019, **DOUGLAS PACKER** committed indecent  
exposure by exposing his genitals and another person is present and the defendant is  
reckless about whether the other person, as a reasonable person, would be offended or  
alarmed by the act, to wit: D.K., in violation of A.R.S. §§13-1402.A, 13-1401, 13-105,  
13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

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**COUNT 10**

On or about January 4, 2019, **DOUGLAS PACKER** committed indecent exposure by exposing his genitals and another person is present and the defendant is reckless about whether the other person, as a reasonable person, would be offended or alarmed by the act, to wit: E.D., in violation of A.R.S. §§13-1402.A, 13-1401, 13-105, 13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

DATED this 10th day of January, 2019.

COCHISE COUNTY ATTORNEY

True Bill

BY:

Lori A. Zucco  
LORI A. ZUCCO

Chief Criminal

Deputy County Attorney

Jamere Moore  
Foreperson of the Grand Jury

/lm